

REMARKS

Claims 1-14 and 16-22 were examined and reported in the Office Action. Claims 1-14 and 16-22 are rejected. Claims 1, 6, 13 and 18 are amended. Claims 1-14 and 16-22 remain.

Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. § 102(e)

A. It is asserted in the Office Action that claims 1-14 and 16-22 are rejected under 35 U.S.C. § 102(e), as being anticipated by U. S. Patent Application No. 2002/0078161 by Cheng ("Cheng"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP §2131,

'[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' (Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). 'The identical invention must be shown in as complete detail as is contained in the ... claim.' (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989)). The elements must be arranged as required by the claim, but this is not an ipsissimis verbis test, *i.e.*, identity of terminology is not required. (In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)).

Applicant's amended claim 1 contains the limitations of

[a]n apparatus comprising: an electronic device for coupling to a home network system, the electronic device having a memory device, the memory device contains a remote location's complete address to a page storing one of control and characteristic information for the electronic device, one of the control and the characteristic information is retrieved from the remote location if the home network system does not have the one of control and the characteristic

information stored, the electronic device achieves plug-n-play (UPnP) capability without using a UPnP protocol.

Applicant's amended claim 6 contains the limitations of

a plurality of electronic devices each including a memory device, each of the memory devices contain a remote location's complete address to a page storing one of control and characteristic information for each electronic device, one of the control and the characteristic information is retrieved from the remote location if a home network system does not have the one of control and the characteristic information stored; a plurality of device specific buses coupled specifically to the plurality of electronic devices; a plurality of device specific network bridge devices coupled specifically to the plurality of device specific buses and the home network; and a device for communicating with a remote network, wherein each of the electronic devices achieve plug-n-play (UPnP) capability without using a UPnP protocol.

Applicant's amended claim 13 contains the limitations of

[a] method comprising: generating a request for a device's remote location complete address to a page storing one of control and characteristic information for the device; receiving the requested device's complete address from the device; determining whether characteristic information for the device is previously stored on a home network system; communicating with the remote location if the device's characteristic information is not previously stored on the home network system; retrieving the device's characteristic information if the characteristic information is not previously stored on the home network system; storing the characteristic information not previously stored on the home network system; controlling the device on the home network system, wherein the device achieves universal plug-n-play (UPnP) capability without using a UPnP protocol.

Applicant's amended claim 18 contains the limitations of

[a]n apparatus comprising a machine-readable medium containing instructions which, when executed by a machine, cause the machine to perform operations comprising: generating a request for a device's remote location complete address to a page storing one of control and characteristic information for the device; receiving the requested device's

complete address; determining whether characteristic information for the device is previously stored on a home network system; communicating with the remote location if the device's characteristic information is not previously stored on the home network system; retrieving the device's characteristic information if the characteristic information is not previously stored on the home network system; storing the characteristic information not previously stored on the system; and controlling the device on the home network system, wherein the device achieves universal plug-n-play (UPnP) capability without using a UPnP protocol.

Cheng discloses a UPnP controller 120 that uses the UPnP protocol to communicate with UPnP enabling device 200. UPnP enabling device 200 includes an IP network interface that receives commands and requests from the UPnP controller 120 using UPnP protocol and slave network interfaces, and transforms the UPnP protocol to device and network specific commands and requests. "These device and network specific commands and requests are communicated to the controlled non-UPnP device, via the slave network, using the slave network's protocol." (Cheng, Abstract). The UPnP enabling device 200 also includes "enabling logic to support the UPnP addressing, discovery, and description processes for each of the devices on the non-IP network. (*Id.*) In other words, the UPnP enabling device 200 acts as an emulator by translating UPnP protocol and non-UPnP protocol to one another.

It is asserted in the Office Action in section 4 that Cheng discloses "the electronic device achieves plug-n-play capability without using a protocol." Applicant respectfully disagrees. Cheng's emulation creates PnP for non-UPnP devices. However, Cheng's emulation system clearly uses more than one protocol. (Cheng, Abstract). Further, it is asserted in the Office Action that Cheng discloses an electronic device and asserts UPnP controller 120. Then, it is asserted in the Office Action that Cheng teaches the electronic device (i.e., UPnP controller 120) achieves plug-n-play capability without a protocol. Clearly, a UPnP controller already has plug-n-play capability, but it must use the UPnP protocol. Otherwise, UPnP controller 120 would not be a UPnP device.

Moreover, Cheng does not teach, disclose or suggest the device achieves universal plug-n-play (UPnP) capability without using a UPnP protocol. Without using a UPnP protocol the invention of Cheng could simply not work.

Therefore, since Cheng does not disclose, teach or suggest all of Applicant's amended claims 1, 6, 13 and 18 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) has not been adequately set forth relative to Cheng. Thus, Applicant's amended claims 1, 6, 13 and 18 are not anticipated by Cheng. Additionally, the claims that directly or indirectly depend on claims 1, 6, 13 and 18, namely claims 2-5, 7-12, 14-17, and 19-22, respectively, are also not anticipated by Cheng for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 102(e) rejections for claims 1-14 and 16-22 are respectfully requested.

CONCLUSION


In view of the foregoing, it is submitted that claims 1-14 and 16-22 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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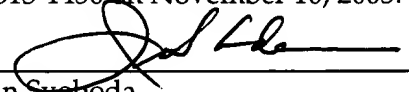
Dated: November 10, 2005

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I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on November 10, 2005.


Jean Svoboda